

November 23, 2005

HCP Planning Team
DNRC HCP
2705 Spurgeon Road
Missoula, MT 59804

Dear Planning Team,

I am writing on behalf of Defenders of Wildlife, a national non-profit conservation organization dedicated to the protection of all native wild animals and plants in their natural communities. We have close to 500,000 members and supporters nationwide, many of whom reside in Montana. We have had a presence in the Northern Rockies for close to thirty years and have been active in efforts to conserve and restore large predators like wolves, grizzly bears and lynx. We appreciate the opportunity to provide specific comments on the Draft Conservation Strategies for the Habitat Conservation Plan and look forward to being involved in the process as the document continues to be developed and refined.

Our comments concentrate on the Draft Conservation Strategy for Grizzly Bear, as that species is the primary focus of our work in the Missoula office. We have both general concerns and specific recommendations which we will outline below.

General Concerns

One of the overarching issues that is absent from the existing strategy is the inclusion of specific habitat standards that are to be maintained for grizzly bears. While there is ample language about reducing disturbance of bears, there is no mention of steps to prevent habitat degradation nor are there references to situations when it would be inappropriate to harvest timber because of the negative impacts on bear habitat. We would strongly urge you to consider adding language providing assurances that crucial bear habitat will not be destroyed or degraded as a result of DNRC actions. While there is some language in the existing Administrative Rules of Montana regarding habitat it would be helpful to integrate this further into the document.

While there is considerable language about not creating new roads, there is no mention of closing existing roads. Grizzly bears are extremely susceptible to disturbance by roads and roads also contribute to increased bear/human conflicts and bear mortality. We encourage DNRC to consider closing and obliterating roads in key habitat.

The purpose of this document is to provide the Fish and Wildlife Service with assurances that actions taken by your agency will minimize impacts on bears. And while there are numerous statements about important approaches that would contribute to bear conservation, there is no certainty that they will be followed because of wording like "where practicable" being added. The list of examples is quite extensive:

p. 3-2 line 19-20, p. 3-4 line 22, p. 3-5 line 39, p. 3-7 line 4-5, p. 3-8 line 11, line 22, p. 3-16 line 10, 35, p. 3-17, line 11 “where opportunities exist”, p. 3-21 line 16 “will consider”, p. 3-25 line 32. We feel this would be a much stronger document if this language weakening the commitments were removed. In addition to this very flexible language, there are also numerous exceptions to the proposals throughout the documents, which again undermine the standards. We are particularly concerned with the many exceptions to the 4 year management and 8 year rest period. It would also be helpful if the document provided the rationale for choosing those time frames for those time frames.

It is very difficult to tease out which standards apply on which types of lands as the document is currently laid out. Is there any way a chart could be developed that would make it simpler to compare which language applies to the different types of land management zones?

It would be helpful if at the beginning of the document DRNC provided an explanation for why some lands are included in the proposal and others are left out. Without having a close look at the map, many would assume that all DNRC lands are included.

Specific Issues

To facilitate evaluation of these comments, they are addressed by the order they appear in the document.

Page 3-1. The Information and Education section could be significantly improved to reduce the likelihood of bear/human conflicts. Providing brochures to contractors is likely not the best way of getting the message across. We would suggest that you have contractors view a video instead of providing them with written materials and hoping that they read them. It also seems like it would make sense to post signage with “bear smart” messages in areas where there is a high likelihood of people encountering bears on state lands. We would also suggest that the sentence on lines 19-20 be reworded to read “Training will address topics such as using bear pepper spray, being aware of seasonal habitats important for bears, proper food storage and how to prevent conflicts.”

Line 36. It would be helpful to clarify who is to provide the containers so items may be stored in a bear-resistant manner.

Line 38. If burnable objects are not to be buried, discarded or burned what do you recommend people do with them?

Also, are there places on DNRC lands where the agency should be providing bear-resistant dumpsters or containers to reduce the chances of bears becoming habituated to non-natural foods?

Page 3-2, line 35. The distance of .6 miles seems like a very small distance for suspending motorized forest management activities. What does the literature say about

what kind of buffer should be drawn around den sites to avoid disturbance? It would be helpful for the rationale to include a discussion of how susceptible bears are to disturbance when hibernating.

Page 3-4, line 24. We feel that there should be a cap on total road densities in habitat occupied by grizzly bears.

Page 3-5, line 28. It would be helpful to define the dates for “spring period”. They are defined for the Stillwater and Swan but not for non-recovery occupied habitats mentioned in this section.

Page 3-7, line 26. We do not feel that 30 days is a sufficient time period to allow the Fish and Wildlife Service to review weed grazing mitigation plans using small livestock. Recognizing that grizzly bears and sheep or goats do not mix, and managers have spent years working to reduce the number of small livestock in grizzly bear habitat. The unregulated use of sheep and goats threatens to undo much of that important work. We feel that FWS should be given more time to review plans and that Montana Fish, Wildlife and Parks should also be included. Not only to assess the potential conflicts with grizzly bears but also bighorn sheep.

Line 30-31. We would suggest that guard dogs be added to the list of potential mitigation measures. And we would prefer the wording “mitigation plans should include...” as we feel it is important for those using these weed control methods to take action to protect their livestock and reduce the chances of conflict with bears and other predators.

Line 37. We would suggest rephrasing this sentence as such “Bears may kill sheep, which results in property damage, threats to human safety, death to individual bears or indirect mortality due to habituation.”

Page 3-8, line 12. We do not feel that timer permits should be excepted from the requirement that “DNRC will assess impacts to important bear habitat elements and develop site-specific mitigations...”

Page 3-9, line 4. We would suggest adding the word “all” before “closures”.

Lines 19-25. Excellent language for reducing the likelihood of conflicts with livestock in the recovery zone. You might also consider adding language about actions that can be taken to prevent conflicts with cattle, like the quick removal of dead or dying individuals.

Page 3-30, line 4-6. The 30 day time frame given to FWS for reviewing a mitigation plan seems too short given their work load .

Comments on the Grizzly Bear Species Account

Page 2-1, First paragraph. North Cascades, Washington should be added to the current range of grizzly bears.

Page 3-2 You might include mention of pine beetles as well as blister rust

Page 3-5, Last paragraph. “It may not be appropriate to speak in terms of explicit corridors or linkages for bear populations: there is little evidence to support delineation of areas that grizzly bears would use to connect to otherwise isolated habitat blocks.” We disagree. Both Servheen and Proctor have done extensive work on linkage zones.

Page 4-1, Timber Harvest. “...increased human activity, which tends to displace grizzly bears *and can result in bear mortality.*”

Page 4-2, Weed Control. The statement that “no sensitivity to seed control activities was found...” is incorrect. Should sheep or goats be used for weed control there can indeed be negative impacts on grizzly bears.

Page 5-1. Second Paragraph, first sentence. “It is clear that human access is one of the most influential factors affecting grizzly bear habitat security *and survival*”

We feel the Conservation Strategy for Grizzly Bears is a step in the right direction towards addressing grizzly bears conservation needs on state lands and we appreciate the chance to provide our input. Please do not hesitate to contact us if you need clarification of any of the concerns listed above. Thank you again for the chance to share our thoughts on this important document.

Sincerely,

Minette Johnson
Northern Rockies Representative